# Exhibit B

### Case 2:23-cv-01043-JWH-KES Document 252-3 Filed 01/03/24 Page 2 of 6 Page ID #:10426

From: Rahebi, Bita <BRahebi@mofo.com>
Sent: Thursday, December 21, 2023 2:28 PM

**To:** Oliver Richards; David Barkan; Laris, Elsa G.; Chris Marchese; Taylor Burgener; Adam Shartzer; Ruffin

Cordell; Richard Sterba; Ralph A. Phillips; Michael Ballanco; Ashley Bolt; John-Paul Fryckman

**Cc:** MoFo\_MaxLinear

**Subject:** RE: Entropic Communications LLC v. Dish Network Corporation, Case No. 23-cv-1043 - letter from

Rahebi to Barkan - Contains AEO

Oliver,

Thank you for your email. We have already drafted the motion and we will proceed with the filing tomorrow. We look forward to hearing from David after his vacation as we do not believe the claims against MaxLinear should continue.

Happy holidays to you and your team.

Bita

From: Oliver Richards <orichards@fr.com>
Sent: Thursday, December 21, 2023 2:19 PM

Cc: MoFo\_MaxLinear < MoFo\_MaxLinear@mofo.com>

**Subject:** RE: Entropic Communications LLC v. Dish Network Corporation, Case No. 23-cv-1043 - letter from Rahebi to Barkan - Contains AEO

#### **External Email**

#### Bita,

Just following up on my email below. Please let me know whether MaxLinear is amenable to an extension as I have outlined below.

Very Best, Oliver

From: Oliver Richards

Sent: Tuesday, December 19, 2023 6:34 PM

**To:** 'Rahebi, Bita' < <u>BRahebi@mofo.com</u>>; David Barkan < <u>Barkan@fr.com</u>>; Laris, Elsa G. < <u>ELaris@mofo.com</u>>; Chris Marchese < <u>marchese@fr.com</u>>; Taylor Burgener < <u>burgener@fr.com</u>>; Adam Shartzer < <u>shartzer@fr.com</u>>; Ruffin Cordell < <u>RBC@fr.com</u>>; Richard Sterba < <u>Sterba@fr.com</u>>; Ralph A. Phillips < <u>RPhillips@fr.com</u>>; Michael Ballanco

### Case 2:23-cv-01043-JWH-KES Document 252-3 Filed 01/03/24 Page 3 of 6 Page ID #:10427

<ballanco@fr.com>; Ashley Bolt <bolt@fr.com>; John-Paul Fryckman <Fryckman@fr.com>

Cc: MoFo MaxLinear < MoFo MaxLinear@mofo.com>

Subject: RE: Entropic Communications LLC v. Dish Network Corporation, Case No. 23-cv-1043 - letter from Rahebi to

Barkan - Contains AEO

Bita,

I am responding on behalf of David Barkan as he is on vacation this week. We are in receipt of your letter and are preparing a fulsome response. However, as your issues appear to arise out of Dish California's assertion of FRAND-related counterclaims—issues which may be resolved once the other Dish defendants become part of the case—we believe any motion to dismiss would be most efficiently decided after Dish's venue motion is decided. Moreover, your letter raises other issues that may be cured through amendment of Dish California's counterclaims—potential amendments that we would need additional time to consider. As such, we believe it would be mutually beneficial to seek an extension of time for MaxLinear and Entropic to answer or otherwise respond to Dish's counterclaim complaint until after the Court decides the pending venue motion. More specifically, we would propose that MaxLinear's deadline to answer or otherwise respond be extended to 21 days after all Dish entities answer and file counterclaims. In addition to allowing the Court to decide these issues in light of all of the parties, this would allow MaxLinear and Entropic to only have to respond to these counterclaims once.

Please let us know whether MaxLinear is amenable to such an extension or whether you would like to discuss further.

Very Best, Oliver

Oliver Richards :: Principal :: Fish & Richardson P.C. 858 678 4715 direct :: 619 630 8453 mobile :: ojr@fr.com

From: Rahebi, Bita < BRahebi@mofo.com > Sent: Monday, December 18, 2023 3:02 PM

**To:** David Barkan <<u>Barkan@fr.com</u>>; Laris, Elsa G. <<u>ELaris@mofo.com</u>>; Chris Marchese <<u>marchese@fr.com</u>>; Taylor Burgener <<u>burgener@fr.com</u>>; Adam Shartzer <<u>shartzer@fr.com</u>>; Ruffin Cordell <<u>RBC@fr.com</u>>; Oliver Richards <<u>orichards@fr.com</u>>; Richard Sterba <<u>Sterba@fr.com</u>>; Ralph A. Phillips <<u>RPhillips@fr.com</u>>; Michael Ballanco <<u>ballanco@fr.com</u>>; Ashley Bolt <<u>bolt@fr.com</u>>; John-Paul Fryckman <<u>Fryckman@fr.com</u>>

Cc: MoFo MaxLinear < MoFo MaxLinear@mofo.com >

**Subject:** RE: Entropic Communications LLC v. Dish Network Corporation, Case No. 23-cv-1043 - letter from Rahebi to Barkan - Contains AEO

Hi David,

Confirmed. It references the Dish/EchoStar Promoter agreement produced by Dish.

### Case 2:23-cv-01043-JWH-KES Document 252-3 Filed 01/03/24 Page 4 of 6 Page ID #:10428

Best, Bita

From: David Barkan < Barkan@fr.com >

Sent: Monday, December 18, 2023 2:58 PM

**To:** Laris, Elsa G. < <u>ELaris@mofo.com</u>>; Chris Marchese < <u>marchese@fr.com</u>>; Taylor Burgener < <u>burgener@fr.com</u>>; Adam Shartzer < <u>shartzer@fr.com</u>>; Ruffin Cordell < <u>RBC@fr.com</u>>; Oliver Richards < <u>orichards@fr.com</u>>; Richard Sterba < <u>Sterba@fr.com</u>>; Ralph A. Phillips < <u>RPhillips@fr.com</u>>; Michael Ballanco < <u>ballanco@fr.com</u>>; Ashley Bolt < <u>bolt@fr.com</u>>; John-Paul Fryckman < <u>Fryckman@fr.com</u>>; David Barkan < <u>Barkan@fr.com</u>>; Rahebi, Bita

<BRahebi@mofo.com>

Cc: MoFo\_MaxLinear < MoFo\_MaxLinear@mofo.com >

**Subject:** RE: Entropic Communications LLC v. Dish Network Corporation, Case No. 23-cv-1043 - letter from Rahebi to Barkan - Contains AEO

**External Email** 

Dear Bita,

Please confirm that the only confidential information in your letter is Dish's and therefore we may share the letter with our client.

Best regards,

David

David Barkan:: Fish & Richardson P.C.:: 650 839 5065

From: Laris, Elsa G. < <a href="mailto:Elsa@mofo.com">Elsa G. < <a href="mailto:Elaris@mofo.com">Elaris@mofo.com</a>>
Sent: Friday, December 15, 2023 4:31 PM

**To:** David Barkan < <u>Barkan@fr.com</u>>; Chris Marchese < <u>marchese@fr.com</u>>; Taylor Burgener < <u>burgener@fr.com</u>>; Adam Shartzer < <u>shartzer@fr.com</u>>; Ruffin Cordell < <u>RBC@fr.com</u>>; Richard Sterba < <u>Sterba@fr.com</u>>; Ralph A. Phillips < <u>RPhillips@fr.com</u>>; Michael Ballanco < <u>ballanco@fr.com</u>>; Ashley Bolt < <u>bolt@fr.com</u>>; John-Paul Fryckman < <u>Fryckman@fr.com</u>>

Cc: MoFo\_MaxLinear < MoFo MaxLinear@mofo.com >

**Subject:** Entropic Communications LLC v. Dish Network Corporation, Case No. 23-cv-1043 - letter from Rahebi to Barkan - Contains AEO

[This email originated outside of F&R.]

Dear Counsel:

Please see attached sent on behalf of Bita Rahebi.

Regards,

**Elsa Laris** 

Legal Secretary elaris@mofo.com T+1 (213) 892-5391

Morrison Foerster 707 Wilshire Boulevard Los Angeles, CA 90017-3543

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